



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NCG/AP
F. #2022R00039

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 18, 2023

By ECF

The Honorable Raymond J. Dearie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Thomas Welnicki
Criminal Docket No. 22-164 (RJD) (S-2)

Dear Judge Dearie:

The government respectfully moves to dismiss Count One of the Second Superseding Indictment against the defendant in the above-captioned matter. On or about December 12, 2022, the parties entered into a deferred prosecution agreement (“DPA”) as to Count One of the Second Superseding Indictment until December 12, 2023. See ECF No. 64. The government now seeks to dismiss Count One of the Second Superseding Indictment against the defendant because the defendant has complied with the terms of the parties’ DPA. Accordingly, the government respectfully requests that the Court dismiss Count One and close this case.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Deirdre D. von Dornum, Esq. (by ECF)